

September 22, 2014

Board of Forestry and Fire Protection  
Attn: Kevin Conway, Staff Forester  
P.O. Box 944246  
Sacramento, CA 94244-2460



RE: Comments on "Forest Fire Prevention Pilot Project Exemption" –  
Proposed revisions to slash treatment requirements.

Dear Chair Gilless and Board Members:

The Buckeye strongly supports the proposed revisions to the slash treatment requirements for the "Forest Fire Prevention Pilot Project Exemption" as noticed by the Board on September 12. This proposed revision would increase the maximum allowed post-logging slash height from 9 inches to 18 inches, and would modify the timing for slash treatments for operations that occur later in the season. We urge the Board to adopt these proposed revisions.

The Buckeye is a non-profit organization with over 150 family, individual and commercial memberships, representing over 300,000 acres of forests and rangeland in Humboldt County.

The Buckeye believes this revision is important for a number of reasons. Flexible slash treatment should be flexible and we believe adopting an 18 inch slash standard is a reasonable standard. Imposing the additional standard to lop remaining slash to a 9-inch depth would be a burden to many landowners that may dissuade them from utilizing this Pilot Project Exemption. Given this is a thinning operation, operational slash will be discontinuous and 18 inches slash is sufficient to meet hazard reduction goals. The Pilot Project Exemption, pursuant to the passage of AB 744, is indeed a pilot project to examine the efficacy of fire prevention standards. We believe the 18-inch standard will reduce overall slash consistent with the goals of AB 744 and treatment costs to the point where this Exemption will be used more frequently.

The Buckeye also supports the other major proposed provisions in the Pilot Project Exemption that allows slash piles created after September 1 to be burned by April 1 of the 2nd year following creation.

We also encourage the Board to adopt the change to the rule that includes the coastal counties as authorized in AB 2142.

The Board's over-arching goal should be to make this Pilot Project Exemption as functional and attractive to landowners as possible. Given California's extreme wildfire status, we believe the Board needs to be pro-actively encouraging wide-spread forest fuel-reduction projects. We believe this Exemption will be an important tool in meeting this goal. We encourage the Board to adopt the proposed revisions to the Pilot Project Exemption and to request CAL FIRE provide annual reports on its effectiveness.

Sincerely,

A handwritten signature in blue ink, appearing to read 'William May', is written over the typed name.

William May, Chairman

P.O. BOX 5607 • EUREKA, CA 95502 • TEL 707.725.8847  
email: buckeye@humboldt1.com • web: www.buckeyeconservancy.org